



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JPL/MRG
F. #2019R01460

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 17, 2023

By ECF

Alex Spiro, Esq.
Daniel Koffman, Esq.
Michael T. Packard, Esq.
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010

Re: United States v. Javier Aguilar
Criminal Docket No. 20-390 (S-1) (ENV)

Dear Counsel:

Enclosed are the government's initial disclosures pursuant to 18 U.S.C. § 3500 and Rule 26.2 of the Federal Rules of Criminal Procedure ("3500 material") for the individuals whom the government may call as witnesses at trial in the above-referenced case. Additionally, pursuant to Giglio v. United States, 405 U.S. 150 (1972) and its progeny, and out of an abundance of caution, the government also hereby discloses statements of other persons whom the government does not presently intend to call as witnesses at trial. Individuals whom the government may call as witnesses at trial are identified with an asterisk (*) on the enclosed list. In addition, to aid you review, the government is attaching an index of recorded conversations in which potential witnesses participated. Please note that the 3500 material as well as the corresponding list of 3500 material below are subject to the stipulation and protective order dated August 11, 2023. See ECF No. 171.

The government reserves the right to amend its witness list and will produce any additional 3500 material on a rolling basis as it becomes available.

The government requests disclosure of any defense exhibits and, pursuant to Rule 26.2 of the Federal Rules of Criminal Procedure, prior statements of potential defense witnesses. The government also continues to request reciprocal discovery.

Very truly yours,

BREON PEACE
United States Attorney

By: _____/s/
Jonathan P. Lax
Matthew R. Galeotti
Assistant U.S. Attorneys
(718) 254-6139/6340

Without enclosures

cc: All counsel (by ECF)